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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

DECLARATION OF STEVEN DUONG IN SUPPORT OF DEFENDANT CITY AND COUNTY OF SAN FRANCISCO'S OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Hearing Date: October 27, 2025
Time: 8:30 a.m.
Place: Courtroom 6, 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: August 10, 2026

Attachments: Exhibits A-B

1 I, STEVEN DUONG, declare:

2 1. I am the Operations Supervisor of the Corridor Program within the Bureau of Street
3 Environmental Services within the San Francisco Department of Public Works ("DPW"). My job
4 duties include overseeing DPW's street and sidewalk cleaning operations within the City and County
5 of San Francisco. I was promoted to Operation Supervisor in December 2012 and have been working
6 for DPW in my current role since then. Since my promotion, I have overseen two operations within
7 DPW/BSES. From December 2012 to May 2016, I was overseeing the Swing Shift Operations. From
8 May 2016 to March 2022, I was overseeing the Corridor Program Operations. And from March 2022
9 to December 2024, I was again assigned to overseeing the Swing Shift Operations. From January
10 2025 to present, I am overseeing the Corridor Program. I have personal knowledge of the contents of
11 this declaration unless otherwise stated and believe the contents to be true. If called upon to testify, I
12 could and would testify competently to the contents of this declaration.

13 2. I am informed and believe that Plaintiffs allege harm from conditions that exist in the
14 Tenderloin neighborhood.

15 3. DPW is responsible for maintaining all streets, roadways, and the public spaces in the
16 city of San Francisco.

17 4. I supervise and manage the "Corridor Program" of Public Works. The Corridor
18 Program a group of 130 to 150 Corridor Program staff which includes supervisors, leads, laborers, and
19 ambassadors who are engaged in various type of street cleaning tasks on the streets, sidewalks, and the
20 public right away in the city of San Francisco such as manual sweeping, litter pick up, weeding,
21 graffiti abatement, illegal postings removal, and reporting any deficiency on their assigned city block
22 routes.

23 5. The City also uses both mechanical sweepers and mechanical flushers to care for its
24 roadways in addition to and outside of the Corridor Program.

25 6. Mechanical sweepers are vehicles with brushes underneath that sweep dirt and debris
26 away from curbs. The debris is directed toward a hose under the vehicle and suctioned into a hopper in
27 the back of the vehicle where it is collected and carried away. Mechanical sweepers operate on regular

1 routes and on regular schedules in San Francisco because City residents must move their cars from the
2 curb before the sweepers come through. The mechanical sweepers spray a fine mist of water in front
3 of the vehicle to control the dust that would otherwise be kicked up by the brushes. This water is
4 collected from City hydrants. The mechanical sweepers do not mix any disinfectants or soaps into the
5 water. Each year, mechanical sweepers cover approximately 150,000 miles of City curbs and remove
6 approximately 25,000 tons of debris.

7 7. Mechanical flushers are trucks with water tanks attached to them also used to maintain
8 City streets. A pump causes water to spray out from nozzles built into the truck when the operator
9 presses a button. This occurs while the driver is operating the vehicle. Unlike mechanical sweepers,
10 mechanical flushers do not typically travel the regular routes in part because City residents are not
11 required to move their cars away from the curb before a mechanical flusher comes through. Instead,
12 mechanical flushers are deployed on an “as needed” basis in response to specific service requests. The
13 water used by the mechanical flushers is collected from City hydrants. The mechanical flushers do not
14 mix in any disinfectants or soaps into the water.

15 8. The City uses steamers to care for its sidewalks. Steamers are pressurized power
16 washers attached to pick-up trucks. The water is stored in a tank and sprayed through a hose with a
17 wand at the end. Unlike mechanical flushers, steamers are operated while the vehicle is parked, and
18 the operator is standing outside the vehicle. The water in the steamers is heated for disinfectant
19 purposes, which also has the effect of making the water evaporate faster than it would at room
20 temperature. The water from steamers is heated for disinfectant purposes because DPW may use
21 steamers to remove, for example vomit, urine, or feces from the sidewalks. Like mechanical flushers,
22 employees operating steamers do not typically travel regular routes. Instead, steamers are deployed on
23 an “as needed” basis in response to service requests. Steamers have two tanks attached to them, one
24 carries water and the other carries a disinfectant soap such as Pine Sol or Super Pine for purposes of
25 sanitizing the sidewalk. The steamer mixes the two tanks before the water is released.

26 9. The Tenderloin neighborhood is in Zone B of the Corridor Program, a zone defined by
27 the Department of Public Works to perform necessary work.

1 10. Attached hereto as **Exhibit A** is a true and correct copy of the Zone B Corridor
2 Program Sign-In Sheet for August 2025 that shows the current occupied routes and shifts in the
3 Tenderloin district that are a part of the Corridor Program.

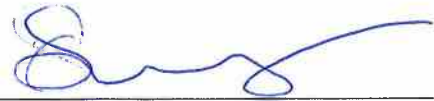
4 11. Attached hereto as **Exhibit B** is a true and correct copy of the Zone AB Corridor
5 Program Sign-in Sheet.

6 12. As can be seen from Exhibits A and B, the Corridor Program runs its maintenance
7 program in the Tenderloin neighborhood from Tuesday to Saturday from 5:30 a.m. to 2:30 p.m. and
8 from Sunday to Thursday from 11 a.m. to 8:00 p.m.

9 13. Exhibits A and B are examples of schedules and daily sign in sheets are expected to
10 remain in place as part of the daily operations of the Corridor Program.

11 I declare under penalty of perjury under the laws of the United States and the State of
12 California that the foregoing is true and correct.

13 Executed on September 15, 2025, at San Francisco, California.

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16 STEVEN DUONG
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